## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

GERALD HOLLIS,	
Plaintiff,	)
VS.	) Case No.: 10 cv 4937
CHASE, EQUIFAX, INC, EXPERIAN INFORMATION SOLUTIONS, INC., TRANSUNION, LLC, and VALENTINE	) Judge: Milton I. Shadur
	) Magistrate Judge Geraldine Soat Brown
& KEBARTAS, INC.,	)
Defendants	)
Defendants.	)

## <u>DEFENDANT CHASE BANK USA, N.A.'S MOTION TO DISMISS COUNTS 1, 6, 11, AND 12 OF PLAINTIFF'S COMPLAINT FOR DECLARATORY, INJUNCTIVE AND OTHER RELIEF</u>

Defendant, CHASE BANK USA, N.A. ("Chase"), by and through its attorneys, Barnes & Thornburg LLP, respectfully moves the Court to enter an Order dismissing Counts 1, 6, 11, and 12 of Plaintiff Gerald Hollis's ("Hollis") Complaint for Declaratory, Injunctive and Other Relief. In support of its Motion, Chase states as follows:

- 1. Hollis's allegations against Chase fail to state a claim upon which relief can be granted. Therefore, Counts 1, 6, 11, and 12 of Hollis's Complaint should be dismissed pursuant to Rule 12(b)(6).
- 2. Chase incorporates all points and authorities contained in its Brief in support of its motion to dismiss, filed concurrently herewith.

WHEREFORE, Defendant Chase Bank USA, N.A., respectfully requests that the Court enter an Order dismissing Counts 1, 6, 11, and 12 of Plaintiff Gerald Hollis's Complaint for

Declaratory, Injunctive and other Relief with prejudice, and for such other relief as the Court deems fair and just.

## Respectfully submitted,

By: /s/ James E. Michel

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